

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

KOSS CORPORATION,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No. 6:20-cv-00665-ADA

JURY TRIAL DEMANDED

JOINT STIPULATION OF DISMISSAL

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiff Koss Corporation (“Koss”) and Defendant Apple Inc. (“Apple”) hereby state that the parties have resolved all matters in controversy between them. Accordingly, Koss and Apple stipulate that the claims brought by Koss against Apple should be dismissed WITH PREJUDICE and the claims brought by Apple against Koss in the above-captioned action (including any consolidated action) should be dismissed WITHOUT PREJUDICE.

For this reason, Koss and Apple ask that the Court enter the attendant proposed Order of Dismissal, with each party to bear its own costs, expenses, and attorneys’ fees.

Dated: July 23, 2022

Respectfully submitted,

By: /s/ Benjamin E. Weed
Darlene F. Ghavimi
Texas Bar No. 24072114
K&L GATES LLP
2801 Via Fortuna, Suite #350
Austin, TX 78746
Tel: (512) 482-6800
Fax: (512) 482-6859

By: /s/ Michael T. Pieja
Michael T. Pieja (*pro hac vice*)
Alan E. Littmann (*pro hac vice*)
Doug Winnard (*pro hac vice*)
Brian O’Donoghue (*pro hac vice*)
Samuel E. Schoenburg (*pro hac vice*)
Jennifer M. Hartjes (*pro hac vice*)
Sarah Kinter (*pro hac vice to be filed*)

darlene.ghavimi@klgates.com

Jim Shimota (admitted *pro hac vice*)

Benjamin E. Weed

(admitted *pro hac vice*)

Philip A. Kunz

(admitted *pro hac vice*)

Erik J. Halverson

(admitted *pro hac vice*)

Gina E. Johnson

(admitted *pro hac vice*)

K&L GATES LLP

70 W. Madison Street, Suite 3100

Chicago, IL 60602

Tel: (312) 372-1121

Fax: (312) 827-8000

jim.shimota@klgates.com

benjamin.weed@klgates.com

philip.kunz@klgates.com

erik.halverson@klgates.com

gina.johnson@klgates.com

Peter E. Soskin

(admitted *pro hac vice*)

K&L GATES LLP

4 Embarcadero Center, Suite 1200

San Francisco, CA 94111

Tel: (415) 882-8200

Fax: (415) 882-8220

peter.soskin@klgates.com

David N. Deaconson

State Bar No. 05673400

PAKIS, GIOTES, PAGE & BURLESON

P.O. Box 58

Waco, TX 76703-0058

(254) 297-7300

Fax: 254-297-7301

Email: deaconson@pakistanlaw.com

GOLDMAN ISMAIL TOMASELLI

BRENNAN & BAUM LLP

200 South Wacker Dr., 22nd Floor

Chicago, IL 60606

Tel: (312) 681-6000

Fax: (312) 881-5191

mpieja@goldmanismail.com

alittmann@goldmanismail.com

dwinnard@goldmanismail.com

bodonoghue@goldmanismail.com

sschoenburg@goldmanismail.com

jhartjes@goldmansimail.com

skinter@goldmanismail.com

Stephen E. McConnico

State Bar No. 13450300

Steven J. Wingard

State Bar No. 00788694

Stephen L. Burbank

State Bar No. 24109672

Paige Arnette Amstutz

State Bar No. 00796136

SCOTT DOUGLASS & McCONNICO

Colorado Tower

303 Colorado St., Ste. 2400

Austin, TX 78701

Tel: (512) 495-6300

Fax: (512) 495-6399

smcconnico@scottdoug.com

swingard@scottdoug.com

sburbank@scottdoug.com

pamstutz@scottdoug.com

Counsel for Defendant Apple Inc.

Counsel for Plaintiff Koss Corporation

CERTIFICATE OF SERVICE

I hereby certify that on July 22, 2022, a true and correct copy of the foregoing document was served on all counsel of record by email.

/s/ Benjamin E. Weed
BENJAMIN E. WEED